

1 W. West Allen, Esq.
Nevada Bar No. 5566
2 Jonathan W. Fountain, Esq.
Nevada Bar No. 10351
3 HOWARD & HOWARD ATTORNEYS PLLC
3800 Howard Hughes Parkway, Suite 1000
4 Las Vegas, Nevada 89169
Telephone: (702) 257-1483
5 Email: wwa@h2law.com
Email: jwf@h2law.com
6

7 Luke A. Connelly, Esq.
(Admitted pro hac vice)
Peter Fishkind, Esq.
(Admitted pro hac vice)
8 WINSTON & STRAWN LLP
200 Park Avenue
9 New York, NY 10166-4193
Telephone: (212) 294-6700
10 Email: lconnelly@winston.com
Email: pfishkind@winston.com
11

12 Ya-Chiao Chang, Esq.
(Admitted pro hac vice)
13 WINSTON & STRAWN LLP
Jin Mao Building, 28th Floor
14 88 Century Boulevard
15 Shanghai 200121
China
16 Telephone: +86-21-2208-2628
Email: ychang@winston.com
17

Attorneys for Plaintiffs/Counterdefendants
18 *AbleView Enterprise Limited and*
AbleView Brands Limited
19

20 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

21 ABLEVIEW ENTERPRISE LIMITED and
22 ABLEVIEW BRANDS LIMITED,

23 *Plaintiffs,*

24 v.

25 JONATHAN PETRILLO and COSMETIC
26 SKIN SOLUTIONS LLC,

27 *Defendants.*
28

Case No. 3:24-cv-00409-ART-CSD

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR
PLAINTIFFS TO RESPOND TO
AMENDED COUNTERCLAIM**

(FIRST REQUEST)

1 Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule IA 6-1, Plaintiffs
2 Ableview Enterprise Limited and Ableview Brands Limited (together, “Plaintiffs”) and
3 Defendants Jonathan Petrillo and Cosmetic Skin Solutions, LLC (together, “Defendants”) hereby
4 agree and stipulate to extend the time for Plaintiffs to file and serve their response to Defendants’
5 Amended Counterclaim, filed on November 8, 2024 (ECF No. 27), the response to which is
6 currently due on Friday, November 22, 2024, unless such time is extended by the Court, as
7 follows:

8 1. The Complaint in this action was filed on September 12, 2024 (ECF No. 1) and
9 Defendants were served with the Summons and Complaint on September 13, 2024 (ECF Nos. 8,
10 16).

11 2. On October 4, 2024, Defendants filed and served Defendants’ Answer to
12 Complaint and Counterclaim (ECF No. 17).

13 3. On October 29, 2024, the Court entered an order approving the parties’ stipulation
14 to extend the time for Defendants to file an amended counterclaim from October 25, 2024, to
15 November 8, 2024. (ECF No. 22.)

16 4. On November 8, 2024, Defendants filed their amended counterclaim. (ECF No.
17 27.) The amended counterclaim alleges the same causes of action initially alleged, but also alleges
18 three new causes of action for: (a) breach of contract (Fifth Cause of Action); (b) breach of the
19 implied covenant of good faith and fair dealing (Sixth Cause of Action); and (c) fraudulent
20 misrepresentation (Eighth Cause of Action). (*See id.* at pp. 19-21; at pp. 22-27.)

21 5. In light of the additional investigation and other work required to address
22 Defendants’ new counterclaims, and to accommodate the Thanksgiving holiday and the vacation
23 schedules of counsel, Plaintiffs’ counsel has requested, and Defendants’ counsel has agreed to
24 extend the deadline for Defendants to file and serve their response to Plaintiffs’ amended
25 counterclaim, from November 22, 2024, to December 2, 2024.

26 6. This is the parties’ first request to extend the deadline for Plaintiffs to file and serve
27 their response to Defendants’ amended counterclaim. The parties make this stipulation in good
28 faith, to promote the just, speedy, and inexpensive determination of this action, and not for

purposes of undue delay.

IT IS SO AGREED AND STIPULATED:

WINSTON & STRAWN LLP

HOLLAND & HART LLP

By: /s/ Luke A. Connelly
Luke A. Connelly, Esq.
(Admitted pro hac vice)
Peter Fishkind, Esq.
(Admitted pro hac vice)
200 Park Avenue
New York, NY 10166-4193
Telephone: (212) 294-6700
Email: lconnelly@winston.com
Email: pfishkind@winston.com

By: /s/ J. Malcolm DeVoy
Robert H. Cassity, Esq.
Nevada Bar No. 9779
J. Malcolm DeVoy, Esq.
Nevada Bar No. 11950
Erica C. Medley, Esq.
Nevada Bar No. 13959
Caitlin J. McMasters, Esq.
Nevada Bar No. 16585
9555 Hillwood Drive, 2nd Floor
Las Vegas, NV 89134
Telephone: (702) 669-4600
Email: bcassity@hollandhart.com
Email: jmdevoy@hollandhart.com
Email: ecmedley@hollandhart.com
Email: cjcmcmasters@hollandhart.com

Ya-Chiao Chang, Esq.
(Admitted pro hac vice)
WINSTON & STRAWN LLP
Jin Mao Building, 28th Floor
88 Century Boulevard
Shanghai 200121
China
Telephone: +86-21-2208-2628
Email: ychang@winston.com

*Attorneys for Defendants/Counterclaimants
Jonathan Petrillo and
Cosmetic Skin Solutions, LLC*

HOWARD & HOWARD ATTORNEYS PLLC

By: /s/ Jonathan W. Fountain
W. West Allen, Esq.
Nevada Bar No. 5566
Jonathan W. Fountain, Esq.
Nevada Bar No. 10351
3800 Howard Hughes Pkwy., Suite 1000
Las Vegas, NV 89169
Telephone: (702) 257-1483
Email: wwa@h2law.com
Email: jwf@h2law.com

*Attorneys for Plaintiffs/Counterdefendants
AbleView Enterprise Limited and
AbleView Brands Limited*

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: November 21, 2024